

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

HALINA PLEWA,	)	
	)	
PLAINTIFF,	)	
	)	Civil Action No. 17-cv-06676
v.	)	
	)	
LVNV FUNDING, LLC, and RESURGENT	)	
CAPITAL SERVICES, LP,	)	
	)	
	)	<u>Jury Demanded</u>
DEFENDANTS.	)	

**DECLARATION OF MICHAEL J. WOOD**

I, Michael J. Wood, Esq., being first duly sworn on oath, deposes and states as follows:

1. That I am one of Plaintiff's attorneys.
2. That Plaintiff, Halina Plewa came to my firm for assistance with debt collection efforts by Defendants LVNV Funding, LLC, and Resurgent Capital Services, LP.
3. That Plaintiff authorized my firm to represent her in this matter.
4. That Plaintiff was notified of her deposition to take place on January 25, 2018.
5. That Plaintiff came to my office to discuss her deposition on January 16, 2018.
6. That upon not appearing for her deposition, my firm has made several attempts to reach Plaintiff, and continues to do so.
7. That Plaintiff does not have a cell phone, only a home phone.
8. That several members of my firm made visits to her home to attempt to contact her.
9. That I myself visited her home on Saturday, February 10, 2018, at approximately 12:00 p.m.
10. That Plaintiff was not home at that time, but that her son Peter Plewa was.

11. That Mr. Plewa stated that he would ask his mother to call when she came home.
12. That Plaintiff did not contact my firm.
13. That I personally visited Plaintiff's home again on Tuesday, February 13, 2018.
14. That Plaintiff was not home.
15. That I spoke with Plaintiff's son again by phone on February 13, 2018.
16. That Plaintiff's son agreed to ask her to come to court at 10:00 a.m. on February 14, 2018, or to contact her attorneys.
17. That I have called Plaintiff's home phone numerous times over the past two weeks and there has been no answer.
18. That my firm is making every effort to re-establish contact with Plaintiff so that we may effectively represent her.

Dated: February 13, 2018

*s/Michael J. Wood*  
Michael J. Wood